

**From:** [Haynes, Diana - AMS](#)  
**To:** [Hrdy, David](#)  
**Subject:** RE: Foreign Use Pesticides  
**Date:** Friday, January 30, 2015 3:25:12 PM

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Hi David,

Some examples:

- Carbendazim in most everything – summer squash, carrots, peaches, raspberries, apple juice...
- TBZ in nectarines
- Chlorpyrifos in carrots
- Chlorpropham in peaches
- AZM in nectarines

Those are three that stick out in Sitra's analysis so far.

Thanks😊

Diana

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**From:** Hrdy, David [mailto:Hrdy.David@epa.gov]  
**Sent:** Friday, January 30, 2015 2:50 PM  
**To:** Haynes, Diana - AMS  
**Subject:** RE: Foreign Use Pesticides

Hi Diana,

In theory, we should be putting these residues into the risk assessment as PDP reports them. However, that said, I have seen where we have explicitly omitted this data. The answer then is, *it depends*.

We need the data to show what the risks actually are so the data are important but decisions may not be used with them all the time.

We can't do much except for when it is a risk or when it is a trade irritant.

We will use the data in the end some how or another. What are some examples, that might help me answer this question too.

David

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**David E. Hrdy**

Senior Scientist

CEB/HED/OPP/OCSP

US EPA [www.epa.gov/pesticides](http://www.epa.gov/pesticides)

Mailcode 7509P

Telephone: **703.305.6990**

Fax: 703.305.5147

OFFICE 10238 Potomac Yard 1 (South)

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**From:** Haynes, Diana - AMS [<mailto:Diana.Haynes@ams.usda.gov>]

**Sent:** Friday, January 30, 2015 10:04 AM

**To:** Hrdy, David

**Subject:** Foreign Use Pesticides

Hi David,

As you know, since 2012, we've been trying to put "foreign use" pesticides into PDP – mostly in response to the OIG audit that recommended EPA, FDA and USDA work to do this.

Primarily, we've been using FDA intel of late to determine what to add – based on what FDA is seeing in imports. These may or may not have a U.S. tolerance.

If they are not registered in the U.S. and aren't going to be, what will EPA do with that data?

I am working with Sitra, one of our new chemists, to put together an update for the April meeting. She asked me this question and I was not entirely sure. I know how the data WITH registrations will be used. Will the no tolerance data be put into an associated cumulative risk cup? Other?

Thanks,  
Diana

*Diana Haynes*, Director

USDA/AMS/S&T

Monitoring Program Division/Pesticide Data Program

1400 Independence Ave SW

Room 0601 South Stop 0276

Washington DC 20250

(202) 572-8167

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